



FOOD ASSISTANCE ACTION COMMITTEE

A Federal, State and County Partnership for policy interpretation and review, food stamp outreach, Quality Control and corrective action activities.

MINUTES

DATE: TUESDAY June 23rd, 2009

TIME: 9:30 a.m. to 3:00 p.m.

**LOCATION: MAMMOTH Conference Room
CDSS Building
2450 Del Paso Rd. Suite 200
Sacramento, California 95834**

- 1. Welcome/Housekeeping**
- 2. Review of Previous Minutes** - One Correction: Change reference from Peasantville to Pleasant Hill.
- 3. RADEP Report - Anna Capetillo**

Pam Miller indicated that the ISAWS counties are migrating to CIV in three waves. It is important to ensure that the sample universes remain complete. ACL instructions are being issued. Participants received a DRAFT of the ACL for this meeting as a handout. Carl said EBT reconciles all FS issuances with the different consortia information and will be used to with the ISAWS counties' information as per the ACL information.

FDRAB will begin the reconciliation process after 4 months. Kern County asked who received the DRAFT ACL. Response: DRAFT went out to the FAAC Committee. San Joaquin asked how it would be possible for the cases to NOT be in the sample (universe). Response: This may occur usually on an expedited service or immediate need issuance completed directly on EBT and not through the county consortia system.

Kim Murdock provided her RADEP presentation. Many counties on the conference call did not have the handouts. Kim committed to getting the handouts to everyone in the future.

Presentation of changes included:

* AC 09-05 Error Tolerance level is now \$50. See SPQC Assessment Memo regarding Income Type 44. 09-05 modified to allow dollar amounts between \$25 and \$50 to be recorded as “correct” case findings.

- 010F002 and 010F001 also reflect this change.
- SE 554 has been turned off. A new edit will be there for new amounts
- Do not give nature and error codes if amounts fall in those ranges
- HELP text error amounts have also been corrected to include the 26-50 amounts.
- SP 44GR and 47CW need to include amount separately
- Reminder – Do not include amounts less than \$50 in the error amounts for 010F008 but DO include incorrect amount in F010 S001 for correct authorized amount.
- SOC1 = what was received
- F003 = what was authorized.
- Case will be coded as correct if differing issuance amounts are less than \$50.

Richard Trujillo shared that FOB staff have gone into RADEP in QC characteristics for CW/TANF Code 44 (with GR) and CW/TANF now Code 47 and Item 344S004 was reviewed by FDRAB to see if they could get the information on RADEP corrected without contacting the counties. They found that 25% of the cases had zero in the field so counties need to re-review the cases to input the correct information. FDRAB will send lists to the counties for these reviews.

There will be cases that are correct “as-is” and will need nothing to be done. The rest must be revised by either July 25th (fed cases) or August 28th (state cases). FDRAB will send two lists (federal and state sample lists) to the Counties. Counties are to complete the case reviews by the above deadlines and record the changes on the lists. Counties will send the federal and state sample lists back to FDRAB with the identified changes and FDRAB will do the actual fixes on RADEP.

4. FS Program Policy Updates

Legislative Update - Tracy E. indicated there were no changes to status on those items pending during the April FAAC meeting except that AB643 on ICT’s is now in committee hearing and AB719 on FC is going to hearing today.

Court Litigation –

Be Vu is close to resolution. The FS 27 still needs to be translated. Heathcock is still in discussion for settlement. CDSS has agreed to require a budget worksheet be attached to NOA's involving overissuances. Loaves and Fishes is still pending settlement. Sim Pitch has been refiled by the plaintiff, but CDSS is not yet looking at the filing.

Pat Cruise brought up the Blackburn suit filed against Orange County and CDSS regarding ES processing. Policy staff indicated it is still in Legal in CDSS and Policy has not yet become involved.

Policy Development –

Tiffany Jones shared that ACL 09-24 on Modified Categorical Eligibility was released on May 27, 2009 with an effective date of July 1, 2009 for ongoing cases and no later than January 1, 2010 for Intake cases. This change reduces the need to verify resources for certain food stamp households.

It will be especially important that the line workers annotate in the case record that PUB 275 brochure was provided to the household. QC will continue to use their standard procedures. However, Richard Trujillo said if we cannot document CE in QC, then QC would be citing an error. Lisa Kim indicated if it is not documented that the feds would review the case as a non-CE case.

Jada Rios spoke to the implementation of ACL 09-025 regarding food stamp application processing for Foster Care recipients who are aging out of that program. A workgroup met on May 27th and it was suggested that a demonstration project be developed. The ACL was released on June 16, 2009.

An ACL on Indigents applying for food stamps indicates that it is not necessary to verify sponsorship if the person applying is an indigent. A non-citizen guide will be out in July. CDSS cautioned this is a guide only and may not cover all circumstances.

5. FS Field Operations Bureau Quality Control Updates

Error Rates Actives/Negatives through January Review Month

Active Error Rate	4.03%
Negative Error Rate	16.8%

QC Sample Completion Rates 81%

Federal Differences/Arbitrations – Marlene Fleming

FOB reviewers are finding that the narratives from line and QC staff are vague and causing errors. It is essential that the What, Where, When, and Why be stated in the narration of case actions so that reviewers can support the case findings. This is especially important on the negative case reviews where so little documentation may be available.

Frequently, there is not sufficient documentation to support the legitimacy of the action taken. If there are no documents to support the case decision, there must be narratives to explain the reason for terminations and denials.

FOB is seeing a number of applicant denials based upon the client's withdrawal of their application during the interview process because they know they are not eligible. (I.E. excess income or property or not all HH members want to apply.)

Counties asked if these are applications taken on-line or from call centers? Neither Marlene nor Lisa Kim from FNS have seen any trends yet that speak to these new types of application processes.

Counties asked if the applicant needed to have signed a withdrawal to have this reason stand? Lisa responded that all withdrawals must be in writing or the application must be held open for the regulatory 30 days. IF the withdrawal is in writing, the case is dropped Not Subject to Review (NSTR).

QC Policy Updates/Releases

QC Transmittals 09-06 and 09-07 have been released since our last meeting. There are three transmittals pending related to the QC Increase in the Tolerance Level, ABAWD time limits and Procedures on NSTR sample case drops.

QC Training Requests

Anyone requesting training should call Naomi in Los Angeles FOB.

On July 1st, FOB will be conducting FNS 310 Overview training for the small counties so that they may have an opportunity to learn how to use the FNS 310 to get out of QC errors. The overview will provide them with the knowledge of QC practices. FOB identified a number of counties who will participate, some of which included Imperial, Shasta, and Tehama counties.

QC Changes

Expedited Services determinations are reported by the counties each month on the DFA 296X reports. Both 3 day and 7 day processing deadlines are recorded. Advocates are looking at these reports (from CalWIN counties) and are questioning the information on these reports.

FNS also reviews this data through QC samples. If we can get to the high 90% on timely processing compliance, California may get Bonus funds. If we are below 90%, California will have to do a corrective action plan for FNS and will require the same of the counties.

FNS has indicated that FOB must review to ES when conducting their negative reviews. For example, if a case is denied FS, FOB must look in the files for all denied applications to determine if the ES determination was completed. It is essential that all counties screen for ES on all applications regardless of whether or not it was requested.

Question: If case does not document/narrate ineligibility for ES via client forms, could the case be cited with an error? **Answer:** Yes.

Question: Will state put this out in writing? **Answer:** Yes, as soon as FNS clarifies details.

Question: When is an expanded review allowed? **Answer:** See Chapter 13 of the FNS 310.

Question: Fresno has a concern about meeting the processing timeframes for ES due to applicants missing appointments for their applications. **Answer:** Jerry Parker responded that it is extremely important to narrate all appointment issues and how it affects any ES determination. FNS added that when eligibility for ES is discovered (even after the 7 day deadline) it must still be processed.

Comment: CalWIN has a system "fix" in to complete the report changes for October. Richard Trujillo stated counties should read the FNS 311 Statistical Guide. He will send out an email to counties on how to access this through the website.

Question: If applicant misses their appointment for their initial screening then subsequently shows up after the 7 day deadline and is found to meet the ES criteria, does the county do ES? **Answer:** Yes, effective from the original application date.

Question: What will be written up by the county QC analyst? **Answer:** A procedural error on untimely processing of ES on active cases. If the cases is on a negative sample, it would depend on what happened after the client did show up. If the application was approved, it would be a drop for NSTR.

EMPHASIS NOTE: FOB and FNS both indicated there is a HUGE federal push on getting ES to clients. Also, advocates are encouraging law suits. There was a long discussion on processing time frames, Washington State Call Centers and On-line applications (where ES information is obtained at the first contact).

Question: Counties asked for a QC Q and A on timeliness of application processing.

Answer: Richard Trujillo asked that counties send him questions.

Question: Ventura asked where the performance standard of 90% is in writing?

Answer: First reference is the Steffins vs. McMahon court case for 1993(?) Richard indicated that CDSS has not yet actually given a specific percentage to counties yet. Pat Cruise shared that the FNS standard is 100% but they will accept 90% from the QC results as an acceptable level for California to avoid a corrective action...no specific reference given. Richard then added that CDSS is looking at both the 3 day and 7 day ES processing timeframe requirements.

Question: If the only applicant is SSI, do we need to do an ES screening evaluation in QC?

Answer: Since California has excluded SSI/SSP recipients from the FS program due to California's additional money for a food allowance in the SSI/SSP benefit level, the SSI/SSP benefit is proof of no eligibility to ES.

Counties concerns

Question: Federal Re-reviews. How are DROP negatives regressed? Sacramento County said they were told it is not regressed. **Answer:** Lisa Kim stated that Drops are an adjustment not a regression.

Question: Are Code 2 and 3 drops treated the same for regression? **Answer:** No. Code 2 NSTR's have an extremely small adjustment applied, if any. Code 3 drops have a higher adjustment calculation which is covered in the FNS 311.

Question: For QC Comp I, why would one ever use a multiplier with any income?

Answer: Lisa Kim stated that Comp I actually means you must convert the actual to a monthly amount as per federal regulations.

Question: What if the client lost the income (job) in the Comp I month? **Answer:** Lisa stated that in that case, you would not use the multiplier for Comp I but would consider the partial month's income. Federal rules say the income must be a monthly figure.

Question: LA County asked if anyone has any ideas on how to improve the completion rate?

Answer: It was suggested that each county should:

- Go through their drops every 3 months and go on to their system to look for new addresses for non-cooperation recipients.
- Look on MEDS for re-applications in other counties
- Make home calls to attempt to get them to cooperate.
- send additional contact letters
- Make sure that the certified letter is sent and any postal notification of an address change is acted upon.

Separate Topic – Deductions Disallowances

Richard Trujillo referenced Federal Policy Memo 09-01 issued 11/2008 and USDA letter dated February 25, 2008 re: whether or not we may disallow deductions when a client failed to report or verify the expenses. Specifically, should California add wording to their different Statement of Fact forms that would tell applicants/clients that they would not receive a deduction unless reported and verified as needed? Richard asked if counties believed it was good idea for California to change their forms to make use of this rule when possible.

Do QC Counties want these forms changed? In past meetings, San Bernardino had brought this forward as a concern due to their knowledge that CWDA committees were working with CDSS to enact this change. They believed (found?) that this would create more errors in their county. Kern stated they do not use deductions to discount (offset) errors and did not understand why there was an issue. Fresno had originally submitted the request to have the forms changed as they believed this could reduce their QC errors. Riverside indicated that they had done a re-review of their cases and believed, just like in any other change it could negatively impact some cases and positively impact others. Solano had found the same as Riverside. The bottom line for many counties was whether or not this would be something that could assist in simplifying processing for line staff as well, since so many counties were unable to fill vacancies. There was also a concern that some forms already have the disclaimer and some do not.

It was stated that the National Directors Conference would be discussing the issue on Friday. Counties would follow 09-01 until further notice. Everyone should continue to do audits as they are currently. There did appear to be a difference in what individual QC counties were doing in this area.

6. FS Field Operations Bureau Management Evaluation Updates

2009 Schedule of Reviews Handout provided of the current ME Review Schedule. Seventeen counties have been completed with 13 to go during the remainder of the year. Individual county letters of findings have been delayed due to FOB staffing issues.

Corrective Action Issues - FAAC Committee participants were provided with the CAP State Letter dated May 18, 2009. There were no specific county items identified.

SEP Funds There are 2 pending requests, one of which is the FS Conference. Thirteen requests have already been approved, but IF there are no firm dates scheduled, the approvals will be pulled. It is essential that BEFORE you make the trip, please get CDSS claim instructions to ensure you can get payment reimbursement.

7. USDA FNS Federal Updates

Operations – Pat Cruise reported that the FNS website is going through a “clean-up” to get non-users off to allow for people who want access to get on the site. Currently, there is not space for additional users.

The Elderly and Working Poor Grants for FS Access requests deadline is August 4, 2009.

FS Coupons are no longer legal tender and cannot be paid on after July 17th, 2009. Participants who have some of these coupons need to spend them right away.

Hope Rios will replace Pat Cruise on an Interim basis. Job opening announcements forthcoming.

Pat is leaving a 13 month calendar pf pending Corrective Action processes for her replacement to use.

Quality Control – Dawn Baker stated that FNS will not do the planned ME for Sacramento and Contra Costa counties. They will do LA County. Review items will include documentation and narration. It is essential that these items be thorough. Dawn indicated that CalWIN has great documentation and comments screens.

All counties will continue to be reviewed for invalid Negatives. San Bernardino and LA will also have staff interviewed on site in the counties during August and September.

National Error Rates for FFY'08 will be published and issued within a few days. All regression has been completed and results will be final.

Dawn will be unable to attend the FAAC August meeting due to a conflict in her schedule as she will be at the NAPIPM conference.

8. Annual Food Stamp Conference

Committee Update - Committee is recommending two one-day conferences be held to allow for greater participation of line staff. The conference in the south will be in Rialto (San Bernardino County). The conference in the North will be in Stanislaus. The conference will be held in late August or early/mid September. Topics will probably include timeliness of ES processing, Negative Best Practices and Conducting Business with less resource.

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It was suggested that it would be a good time to have a presentation on how to write a good narrative, how Stimulus funds will be treated in QC, and QC in the Call Center environment.

Pat Cruise stated that FNS does not have the travel budget to go to 2 days. Richard Trujillo will do estimates on state and county costs for FNS approval.

9. IMAGING Project - The QC counties have successfully implemented their imaging processes for their QC cases. There are only a few counties that have some small issues. FNS is impressed with California's responsiveness to this change.

There was no discussion on counties who are using internal imaging processes for their regular eligibility case processing.

10. County Reports - There were no additional questions or issues from the QC All County meeting that have not already been addressed in the above text.

ADJOURN – Next meeting August 25th in Riverside CA.

Submitted by,

Daphne Criswell

Regional Manager
Riverside County Dept. of Public Social Services